

# Exhibit “D”

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re: )  
 ) Case No. 09-B-29024  
ARENA FOOTBALL LEAGUE, LLC, ) Chapter 11  
 )  
Debtor. ) Hon. Susan Pierson Sonderby

**NOTICE OF BIDDING PROCEDURES, AUCTION DATE, DEADLINE TO OBJECT  
TO ASSUMPTION OF EXECUTORY CONTRACTS AND CURE AMOUNT  
AND SALE HEARING**

TO ALL PARTIES TO EXECUTORY CONTRACTS ON EXHIBIT A:

PLEASE BE ADVISED that, upon consideration of the Trustee's Emergency Motion for Entry of an Order (A) Approving Bidding Procedures for the Sale of Certain of Debtor's Assets to the Highest and Best Bidder, (B) Scheduling an Auction and Hearing to Consider the Sale and Approve the Form and Manner of Notice Related Thereto, (C) Establishing Procedures Relating to the Assumption and Assignment of Certain Contracts, Including Notice of Proposed Cure Amounts, and (D) Granting Related Relief, on October \_\_, 2009, the Bankruptcy Court granted the motion and approved the Bidding Procedures<sup>1</sup> attached hereto as Exhibit 1 for the sale of substantially all of the assets of the Debtor to the highest and best bidder, in bulk or in lots, "AS IS, WHERE IS" and for the assumption and assignment to the Successful Bidder of certain Designated Contracts and Added Contracts of the Debtor.

**Potential Assumption and Assignment**

PLEASE BE FURTHER ADVISED that one or more of the Qualified Bidders for the Listed Assets has designated your contact with the Debtor to be assumed and assigned to that bidder at the Closing of the Sale. The bidder will be responsible to pay the Cure Costs shown on the list of such contracts attached hereto as Exhibit A and be responsible for all future performance under such contract after such Closing.

**Hearing re Sale, Assumption and Assignment**

PLEASE BE FURTHER ADVISED that the Bankruptcy Court has scheduled a hearing to approve the sale and the assumption and assignment of the Designated Contracts and Added Contracts of the Debtor before the Honorable Susan Pierson Sonderby on December \_\_, 2009 at \_\_\_\_ a.m. (prevailing Central time) at the United States Bankruptcy Court for the Eastern District of Illinois, Courtroom 642, 219 S. Dearborn Street, Chicago, Illinois, subject to

---

<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Bidding Procedures. In the event of any inconsistency or conflict between this Notice and the Bidding Procedures or the order approving them, the Bidding Procedures and such Order shall control.

District of Illinois, Courtroom 642, 219 S. Dearborn Street, Chicago, Illinois, subject to adjournment or rescheduling without further notice by an announcement of the adjourned date at the Sale Hearing.

### **Objection Deadline**

PLEASE BE FURTHER ADVISED that the Bankruptcy Court has ordered that all objections to the Sale, the assumption or assignment of Designated Contracts and Added Contracts and to the amount of Cure Costs as shown on Exhibit A shall be in writing, filed with the Clerk of the United States Bankruptcy Court for the Northern District of Illinois, 219 S. Dearborn Street, Chicago, Illinois and served on: (a) counsel for the Trustee, John Collen, Tressler LLP, 233 S. Wacker Drive, Chicago, IL 60606, Fax: (312) 627-1717; (b) counsel for the Lender, Schiff Hardin LLP, 233 South Wacker Drive, Suite 6600, Chicago, IL 60606, Attn: J. Mark Fisher and Jason M. Torf, Fax: (312) 258-5700; (c) counsel to the Committee, Richard S. Lauter, Freeborn & Peters LLP, 311 S. Wacker Drive, Suite 3000, Chicago, IL 60606-6677; Fax: (312) 360-6570; and (d) the United States Trustee, 219 S. Dearborn Street, Room 873, Chicago, IL 60604, Attn: Stephen G. Wolfe, Fax: (312) 886-5794, and shall be filed with the Clerk of the United States Bankruptcy Court for the Northern District of Illinois, in each case to allow actual receipt of the foregoing no later than \_\_\_\_\_, 2009 at \_\_\_\_\_ p.m. (prevailing Central time).

### **Further Information**

Further information about the sale and a copy of the Bidding Procedures may be obtained from Diana L. Casas, Moglia Advisors, 1325 Remington Road, Suite H, Schaumburg, IL 60173, Tel: (847) 884-8282, Fax: (847) 884-1188, E-mail: [dcasas@mogliaadvisors.com](mailto:dcasas@mogliaadvisors.com).

[Exhibit A – List of Cure Amounts – To be supplied pursuant to actual bid]

#473430